

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS  
LIABILITY LITIGATION

MDL No. 2419

Dkt. No. 1:13-md-2419 (FDS)

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' STEERING COMMITTEE'S  
MOTION FOR ENTRY OF DEPOSITION AND ESI PROTOCOLS**

Pursuant to the Court's Minute Entry of February 6, 2014 (Dkt. No. 862), the Plaintiffs' Steering Committee (the "PSC") moves this Court to enter the attached deposition and ESI protocols to be used in discovery in this MDL. The PSC's extensive attempts to meet and confer on these protocols with the defendants is more fully explained in the previous filed declaration of Benjamin A. Gastel (Dkt. No. 811). To the extent the Court will consider argument on the entry of these protocols, the PSC respectfully request that the Court refer the consideration of these protocols to Magistrate Judge Boal.

Date: February 6, 2013

Respectfully submitted:

**/s/ J. Gerard Stranch, IV**

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*Plaintiffs' Steering Committee*

**CERTIFICATE OF SERVICE**

I, J. Gerard Stranch, IV, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Date: February 6, 2014

/s/J. Gerard Stranch, IV  
J. Gerard Stranch, IV